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Attorneys for Defendant

ROWLAND MARCUS ANDRADE

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROWLAND MARCUS ANDRADE,

Defendant.

Case No.: 3:20-CR-00249-RS

**DECLARATION OF JEANNE SOMMA  
IN SUPPORT OF MOTION TO  
CONTINUE**

1 Jeanne Somma states as follows:

2 1. I am the General Counsel and Chief Client officer at Lineal Services. I oversee  
3 the services groups at Lineal and serve as the escalation point related for those services for King  
4 & Spalding. Lineal Services is an eDiscovery company that supports King & Spalding on the  
5 case *United States v. Rowland Marcus Andrade*, 20-CR-249 (N.D.Cal. 2020). Lineal Services  
6 hosts the data produced by the government in the *Andrade* case and provides eDiscovery  
7 support services for the King & Spalding lawyers who serve as Mr. Andrade's pro bono defense  
8 counsel.  
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10 2. The government has produced 4.5 TB of data in the Andrade case.

11 3. One of Lineal's responsibilities on the Andrade case is to run search terms on the  
12 data to reduce the number of documents that have to be reviewed. However, a substantial  
13 amount of the data in the Andrade case is not easily searchable. For example, traditional search  
14 terms cannot be run on audio files, video files, and images (including screen shots, photographs,  
15 and some PDF files). Lineal assisted King & Spalding with quantifying the amount of this type  
16 of data that has been produced. We concluded that there is approximately 300 GB of data that  
17 constitutes audio and video files (50.52 GB of Audio and 238.93 GB of Video) and an additional  
18 166 GB of image file data containing 454,116 documents.  
19

20 4. In addition, audio and video files and images can be found within other non-  
21 audio/video sources, such as in mobile files, social media, and personal laptops and other  
22 devices.  
23

24 5. Other non text data, such as hand-written notes, cannot be quantified and have not  
25 been included in the calculations above.  
26

27 6. Lineal also assisted King & Spalding with determining how much of the produced  
28

1 data is not Bates numbered. We determined that roughly 3 million of the documents produced  
2 by the government in the Andrade case have either no Bates numbers or have a single Bates  
3 number assigned to large numbers of documents (often hundreds). Without Bates numbers, the  
4 review process takes exponentially longer because the documents cannot be organized by issue,  
5 flagged as significant, or easily shared with others.  
6

7 I declare under penalty of perjury that the foregoing is true and correct, and that this declaration  
8 was executed on May 10, 2024 in Lanoka Harbor, NJ.  
9

10 /s/ Jeanne Somma  
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12 JEANNE SOMMA  
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